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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT NEVADA**

CUNG LE, NATHAN QUARRY, JON FITCH,
BRANDON VERA, LUIS JAVIER
VAZQUEZ, and KYLE KINGSBURY, On
Behalf of Themselves and All Others Similarly
Situating,

Plaintiffs,

v.

ZUFFA, LLC, D/B/A ULTIMATE FIGHTING
CHAMPIONSHIP and UFC,

Defendant.

Case No. 2:15-cv-01045-RFB-BNW

PLAINTIFFS' MOTION FOR FINAL APPROVAL OF THE SETTLEMENT

1 Plaintiffs in the action *Le, et al. v. Zuffa, LLC d/b/a Ultimate Fighting Championship and UFC*,
2 Case No. 2:15-cv-01045 (D. Nev.) (the “Action”), on behalf of themselves and the certified Class,
3 hereby move for an order:

4 1. Granting final approval of the Settlement Agreement pursuant to Federal Rule of Civil
5 Procedure 23(e).¹

6 2. Approving the Plan of Allocation,² which provides a fair and reasonable method of
7 determining each Class Member’s allocated share of the Net *Le v. Zuffa* Settlement Fund, including a
8 schedule for the claims process.

9 3. Entering a Final Judgment and Order terminating the litigation between Plaintiffs and
10 Defendant.

11 WHEREFORE, for the reasons set forth in the accompanying memorandum of law, supporting
12 Declaration of Bach-Viet Nguyen of Angeion Group, LLC re Implementation of Settlement Notice
13 Plan and Report on Objection Received, all exhibits filed in support of this Motion, and all other
14 submissions filed in support of the Settlement, Plaintiffs respectfully request that the Court grant this
15 Motion and enter the proposed Final Judgment and Order filed herewith.

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25 ¹ Unless otherwise defined herein, all capitalized terms have the same meanings set forth in the
26 September 26, 2024 Settlement Agreement, attached as Exhibit 1 to the Joint Supplemental Declaration
27 of Eric L. Cramer, Richard Koffman, and Joseph R. Saveri in Support of Plaintiffs’ Motion for
28 Preliminary Approval of the Settlement (filed on October 7, 2024). *See* ECF Nos. 1045-2 (the
declaration), 1045-4 (the Settlement Agreement).

² The Plan of Allocation is attached as Exhibit 2 to the October 2024 Decl. *See* ECF No. 1045-5.

1 Dated: January 30, 2025

Respectfully submitted,

2 /s/ Eric L. Cramer

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